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*Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND OFFICIAL COMMITTEE OF TORT  
CLAIMANTS EXTENDING TIME TO  
RESPOND TO QUANTA ASSUMPTION  
MOTION**

Re: Dkt. No. 1218

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee  
4 of Tort Claimants (the “Tort Committee”), on the other. The Debtors and the Tort Committee  
5 are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and  
6 each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On April 3, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*  
9 *§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 Approving the Utility’s Assumption of*  
10 *Certain Agreements with Quanta Energy Services, LLC*, filed by the Debtors on April 3, 2019  
11 [Dkt. No. 1218] (the “**Quanta Assumption Motion**”), which is set for a hearing before the Court  
12 at 9:30 a.m. on April 24, 2019. Any response or opposition to the Quanta Assumption Motion is  
13 due by 4:00 p.m. (Pacific Time) on April 17, 2019.

14 B. Counsel for the Tort Committee has requested, and counsel for the Debtors has  
15 agreed, that the time for the Tort Committee to respond to the Quanta Assumption Motion be  
16 extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
21 **THAT:**

22 1. The time for the Tort Committee to file and serve any response or opposition  
23 to the Quanta Assumption Motion is extended through 4:00 p.m. (Pacific Time) on April 19, 2019.

24 [Signatures on next page]  
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Dated: April 17, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors  
and Debtors in Possession*

Dated: April 17, 2019

BAKER & HOSTETLER LLP

/s/ Cecily A. Dumas

Cecily A. Dumas

*Attorneys for Official Committee of Tort  
Claimants*